of which were reviewed by the OIC. In addition, the OIC conducted interviews of over 460 people; 58 individuals appeared as witnesses before the Grand Jury. As required by 28 U.S.C. § 594(f), the investigation was conducted in accordance with "the written or other established policies of the Department of Justice respecting enforcement of the criminal laws" to the extent not inconsistent with the OIC's mandate.

In the course of its investigation, the OIC examined certain other events in which people involved in the Hudson matter had been involved in similar patterns of conduct. In this regard, the OIC consulted closely with the Assistant Attorney General in charge of the Justice Department's Criminal Division and the Public Integrity Section of DOJ. These consultations were conducted to confirm that these matters fell within the scope of the OIC's investigative jurisdiction because of the potential for each such event to assist the OIC in evaluating the evidence relating to its core mandate.

Consistent with the letter and spirit of the independent counsel statute, the Department of Justice cooperated extensively with the OIC in sharing information and in determining the extent to which DOJ's and the OIC's interests in particular subject matters and witnesses were overlapping. In addition, the OIC was permitted access to substantial information from the database maintained by DOJ's Campaign Financing Task Force.

The OIC also reviewed the information – including documents and testimony – generated by three congressional investigations and two civil lawsuits relating to the Hudson proposal.